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VIA ECFS

20 December 2016

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *REPLY COMMENTS REGARDING PETITION OF SOMOS, INC. FOR A DECLARATORY RULING
REGARDING REGISTRATION OF TEXT-ENABLED TOLL-FREE NUMBERS, WC
Docket 95-155, WT Docket No. 08-7*

Dear Ms. Dortch:

In response to the comments filed regarding the October 28, 2016 petition filed by Somos, Inc. with the Commission, requesting a 'Declaratory ruling regarding registration of text-enabled toll-free numbers,' we offer the following comments filed:

- **Ecosystem integrity**
 - Various comments submitted to the SOMOS Inc. petition fail to realize or understand the current technical ecosystem environment of the 8xx toll free texting ecosystem is susceptible to violations of its integrity.
 - It is a technical fact that there is no authoritative root for the multiple directories involved for 8xx toll free texting.
 - There are multiple directories involved in the functioning of the 8xx toll free texting ecosystem, which is normal for any complex distributed network ecosystem, however there is no authoritative root and there is no coordination to ensure synchronization of all involved directories, and thus the integrity of the ecosystem is susceptible to errors and failures.
 - The lack of a coordinated and synchronized directory structure for 8xx toll free texting can cause errors in routing, delivery and all subsequent events and actions dependent on correct directory information.

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- **Conflict of interests**

- The integrity of the 8xx toll free texting ecosystem is dependent upon all entities in the food-chain from the owner of the 8xx toll free number down to the individual mobile consumer user being able to 'trust' its immediately adjacent parties are not in conflict with their own interests.
- E.g. – An 8xx toll free texting service provider must 'trust' that whomever it is utilizing for transit & termination services is not also competing against the 8xx toll free texting service provider for the same services. If the supplier is also a competitor to its customer, it is a conflict of interest.

The United States has been a model in innovation and competition. The nascent state of 8xx toll free texting is one that requires action be taken to ensure it succeeds and to enable that innovation.

Pursuant to the Commission's rules, this notice is being filed for inclusion in the public record. Please contact me should you have any questions.

Regards,

Gene Lew

Gene Lew
Principal Architect
Salesforce

